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WA 2917

COMPLETED
December 18 , 1991

12/18/1991

RCRA ESD – INSPECTION REPORT

by W. Douglas Smith

FILE COPY

RCRA INSPECTION REPORT
for
BURLINGTON ENVIRONMENTAL
doing business as
ChemPro Pier 91
12-18-91

FACILITY ADDRESS:

Burlington Environmental Inc.
2203 Airport Way South, Suite 400
Seattle, WA 98134

SITE ADDRESS:

Chemical Processors, Inc.
Pier 91
2001 West Garfield
Seattle, WA 98119

INSPECTION COMMENCED:

12-18-91 @ 0845 hours

SITE CONTACTS:

John D. Steller, Senior Environmental Scientist,
(206) 223-0500
Gary D. Kollman, Environmental Scientist, (206) 223-7791
Nathan E. Mathews, Plant Manager, (206) 284-2450

INSPECTION TEAM:

W. Douglas Smith, Sr. Compliance Investigator,
(206) 553-7176
Jack Boller, (206) 753-9428
Elizabeth McManus, (206) 493-9506

SITE DESCRIPTION AND BACKGROUND:

The facility is located on Port of Seattle property. Burlington Environmental Inc. leases the property and subleases to Pacific Northern Oil (PNOCO) which shares the property. PNOCO also leases or has bought tanks from Burlington Environmental Inc. (Doing business as Chempro Pier 91). PNOCO is the sole customer of Chempro Pier 91. Mr. Mathews said that PNOCO had been recently purchased by Holland America.

Chempro Pier 91 is a TSD, interim status facility with the EPA identification number WAD000812417. They receive waste oils, industrial waters, coolant oil and machine coolants. The wastes they generate from their treatment processes are sent to Burlington Environmental Inc. (DBA Chempro, Lucile St., Seattle.)

Tank capacity operated by Chempro Pier 91 at the time of this inspection was approximately 12,000,000 gallons.

OPENING CONFERENCE:

Ms. McManus, Mr. Boller and I arrived at the facility at 0845 hours. We entered the warehouse area andpresented ourselves to Mr. Nathan E. Mathews, Plant Manager. He invited us into his office where he called the corporate offices of Burlington Environmental Inc. to inform them that a RCRA inspection was taking place.

We explained the scope and sequence of the proposed inspection while we waited for corporate staff to arrive.

John D. Stiller, Senior Environmental Scientist; and Gary D. Kollman, Environmental Scientist arrived by 0915 hours. At that point we began an in depth discussion of the waste streams and processes used at the facility. That conversation lasted until 1130 hours when we broke for lunch.

Our initial questioning centered on the change in corporate relationships between PNOCO, Chempro Pier 91, Chempro Lucile St. and Burlington Environmental. Mr. Mathews explained that Chempro no longer existed as a corporation. He said that all business licenses had been changed and all the business cards and logos would change on January 1, 1992. He said that Burlington Environmental Inc. would continue doing business as Chempro at Pier 91 only until January 1.

I asked who the Burlington Environmental Inc. chief executive officer was? Mr. Mathews said that it was John Craig, PhD. Dr. Craig had been President for approximately one year, Mr. Mathews said.

Mr. Mathews said that they had leased or sold two tanks to PNOCO in the past year. These were tanks 99 and 97 with a capacity of 6,000 barrels (252,000 gallons) each. He also stated that Pier 91 had completed the berm around the hazardous materials treatment tanks in March of 1991.

I asked Mr. Mathews what materials were handled at ChemPro Pier 91? He said that they received industrial waters, coolant oils, and machine coolant in addition to the more conventional waste oils. He said that the waste oil business was actually a "lost leader" and didn't make much money for the company. He continued that the industrial water and oily waters were the primary money makers.

I asked him what treatments were involved in recovering the oils and other materials out of the waste industrial waters and oily water? Mr. Mathews said that there were a number of process which took place. He said that most of these took place in tank #164. He said that industrial water contained materials like oil, keel coolers with traces of zinc, D018 oils, benzenes, occasional leads, soaps, cleaners and solvents. He said that manifested wastes at Chempro Pier 91 were F001, F002, F003, and F005 with a few D008, D018 or X listed wastes. He gave me a manifest which listed these wastes in a shipment (See attached manifest # 18988).

Mr. Mathews said that they receive virtually all of the wastes generated by the Boeing Airplane Company in Washington State. He said that Chempro Pier 91 or Chempro Lucile St. did all the waste profiles for Boeing.

Mr. Stiller said, Chempro Pier 91 had a discharge permit that was being revised at the time of this inspection. He said that he would get me a copy with the proposed revisions within 10 working days of this inspection. The wastes which enter the discharge are generated in a batch process. Mr. Mathews explained the processes involved. Mr. Mathews said, most of it comes after flocculation. The flocculent is generated in the treatment of waste waters. The water is discharged and the flocculent is sent to Chempro Lucile St. for disposal. He said that about 100 gallons of flocculent is generated per 9,000-10,000 gallons of industrial water treated. Mr. Mathews said that about 30,000 to 40,000 gallons are discharged under the permit parameters each month.

Mr. Mathews said that all the treatment processes at the facility

could be broken into two basic processes. These were "thermal/chemical and chemical."

I asked Mr. Mathews what the through put of the plant was. He said that in 1986 it had been 10,000-12,000 barrels of waste oil per month. He continued that in 1991 it had been averaging about 5,000 barrels a month. I asked how he could pay the overhead with only 5,000 barrels per month? He said that they made most of their money on waste water. Their treatment process didn't cost much and didn't generate much waste, but they receive about 10¢ a gallon to pick the waste water up.

I asked him to identify the waste streams generated at Chempro Pier 91. Mr. Mathews said, that they were flock, oily rags, oily tank bottoms, and stoddard solvent (napthalene) from parts washing. I asked him to make an estimate of the approximate quantities for each waste. He said that Chempro Pier 91 generated about 3-4 drums each month from their regular treatment processes. In addition they also generated about 2 30-gallon drums from their parts wash each month, and 2-3 drums of paint waste each year, he said.

Ms. McManus, Mr. Boller and I reviewed a random selection of 1991 manifests. The following manifests appeared to have problems with waste identification, importation of hazardous waste and/or notifications (See attached copies).

* 12851 (No.5) Anderson New Alta, Richmond B.C. (importation of hazardous waste, D008)
* 50192 dated 3/14/91; conflict if D008 as manifested or unregulated as stated on attached BC manifest and bill of lading; if D008 may require LDR notification and importation notification.
* 50194 dated 3/15/91; conflict if D008 as manifested or unregulated as stated on attached BC manifest and bill of lading; if D008 may require LDR notification and importation notification.
* 50195 dated 3/18/91; conflict if D008 as manifested or unregulated as stated on attached BC manifest and bill of lading; if D008 may require LDR notification and importation notification.
* 50250 dated 8-19-91 from LaidLaw, BC; No notification provided after my request to J. Stiller.
* 21891 Naval Supply Center Puget Sound (D018); Unresolved if this was state dangerous waste or D018 as manifested; no LDR notification if D018.

* 22191 Naval Supply Center Puget Sound (D018); Unresolved if this was state dangerous waste or D018 as manifested; no LDR notification if D018.

FIELD INSPECTION: 1336 Hours

The inspection team was accompanied in the field by the same facility representatives. We began on the west side of the plant and moved counterclockwise around the facility.

Oil water separator:

We viewed the oil water separator at the point where the plant waste water is discharged under the facilities discharge permit. Mr. Mathews said that oil collected from the oil water separator is recycled into their process stream. This was near the area where oil and oily waters are off loaded to the facility. I took several photographs of these areas.

Operator lab:

We inspected the operator lab where samples are screened for total chlorine and are logged in. Several photographs were taken inside the lab.

Warehouse:

We then inspected the warehouse where the plant boiler is maintained and operated by both PNOCO and Chempro Pier 91. Mr. Mathews identified what parts of the warehouse were operated by PNOCO and which were maintained by Chempro Pier 91. We inspected their product drum storage area where materials were kept for use in their various treatment processes. The drums were neatly organized into chemical family groupings. None of the drums appeared to be leaking.

55 gallon drum of paint waste in store room:

In the north end of the warehouse there was an unlocked storeroom. Inside there were paints, paint wastes, and samples being stored. The samples were all dated within 90 days of the time of the inspection. There was a 55 gallon drum of Hazardous waste paint solids dated 9/23/91 stored in the room. It had a hazardous waste label. It was sealed and was not leaking. Mr. Mathews said that it was stored there as satellite accumulation as well as <90 day storage because that is where paint wastes were generated and the lockable door and vault offered security.

Area of improvement observed:

NOTE: A RCRA inspection in 1990 had discovered several hundred sample containers of material being stored in the same room. Many of the containers were leaking and some were dated as early as 1987. These had been removed and properly disposed of through Chempro Lucile St.

Tank farm:

We inspected the entire tank farm area. There were no leaks observed. Mr. Mathews identified the tanks being used by

PNOCO and those used by Chempro Pier 91.

Lastly we inspected the process laboratory. There were no wastes or spent solvent containers in the laboratory.

CLOSING CONFERENCE:

We concluded the inspection with a brief conference in Mr. Mathews office. I stated that the facility appeared to be handling their old samples more responsibly by cleaning their warehouse storeroom. I stated that I was not at liberty to state if there were violations or not, but I did identify the general sequence and timing of events that would happen after I drafted my report. I said that they would probably not hear from EPA for at least 6 weeks. I repeated my request for a copy of the plant discharge permit within 10 working days.

SAFETY CONSIDERATIONS:

Safety shoes and a hard hat should be worn when inspecting the facility. Be careful of slippery surfaces and exposure to heights when climbing on catwalks.

ATTACHMENTS:

A. Field Notebook
B. Facility manifest copies
C. Photographs

January 17, 1992
DATE

W. Douglas Smith, Sr. Compliance Investigator

PHOTOGRAPHIC SLIDE LOG

SLIDE NUMBER	SUBJECT DESCRIPTION
1.	Entrance to admin. offices of ChemPro Pier 91.
2.	Area where oil and oily waters are offloaded.
3.	Manifold for distribution to and from tank farm
4.	Report and form storage area in process lab
5.	Sample storage area in lab.
6.	Process lab work area

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PHOTO LOG
CHEMICAL PROCESSORS (Pier 91), CORP.
12-5-90

1. Boiler after explosion
2. Boiler after explosion
3. View E. from top of Pier 91 tank farm
4. View W. from top of Pier 91 tank farm
5. Typical baker tank
6. Baker tank
7. Longbeach tank sediment removal operation.
8. Chemical reagent storage area (Product only)
9. Leaking & open sample storage along with waste paint storage. Samples at back of room. Note stained box bottoms from leaking samples.
10. Leaking samples
11. Broken, open & leaking sample containers in storage.
12. Open sample container on floor. Stains. Exxon sample 1989.
13. Hazardous storage of reusables, stores, wastes & samples.
14. Door to sample storage shown in photos 9 thru 13.
15. Performing Chlor-d-teck sample analysis.
16. Sample storage in Administration area E. of lab area.
17. Sample storage - same as photo 16